

FILED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

2018 FEB 20 PM 4:05

CLERK US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,  
Plaintiff,

) CRIMINAL NO.

BY

DEPUTY

v.

I N D I C T M E N T

**A18 CR0057 LY**

[21 USC 846 and 841-

Conspiracy, PWID cocaine base]

Jonathan KAVANAUGH,

And

Dahja JOHNSON,

Defendants.

USAO # 2018R01730

THE GRAND JURY CHARGES:

Count One

[21 U.S.C. § 846]

Beginning as early as January, 2018 and continuing until on or about February 1, 2018 at Austin, Texas in the Western District of Texas and elsewhere, the Defendants,

Jonathan KAVANAUGH,

and

Dahja JOHNSON,

knowingly, intentionally and unlawfully combined, conspired, confederated, and agreed with each other and others known and unknown, to possess with intent to distribute a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and in violation of Title 21, United States Code, Section 846.

Count Two  
[21 U.S.C. § 841]

On or about February 1, 2018, at Austin, Texas, in the Western  
District of Texas, the Defendant,

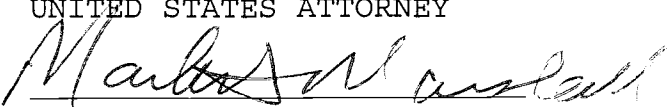
Jonathan KAVANAUGH,  
and  
Dahja JOHNSON,

knowingly, intentionally and unlawfully possessed with intent to  
distribute a controlled substance, which offense involved a  
mixture or substance that contained a detectable amount of 3,4-  
methylenedioxymethamphetamine (MDMA), and cocaine base, all  
Schedule II Controlled Substances, in violation of Title 21,  
United States Code, Sections 841(a)(1) and 841(b)(1)(C).

A TRUE BILL  
**ORIGINAL SIGNATURE**  
**REDACTED PURSUANT TO**  
**E-GOVERNMENT ACT OF 2002**

JOHN F. BASH  
UNITED STATES ATTORNEY

By:

  
MARK H. MARSHALL

Assistant U.S. Attorney